

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA)
)
) No. 14 CR 287
v.)
) Judge Charles R. Norgle
LEONARDO SANDERS)
)

UNOPPOSED MOTION
TO EXTEND TIME FOR VOLUNTARY SURRENDER

Defendant LEONARDO SANDERS, by the Federal Defender Program and its attorney, DANIEL HESLER, moves this court extend the date on which Mr. Sanders will be required to surrender himself to the custody of the Bureau of Prisons by approximately 60 days. In further support of this motion, defendant states as follows:

1. On November 30, 2017, this Court sentenced Mr. Sanders to serve 28 months in the custody of the Bureau of Prisons. Mr. Sanders was ordered to surrender himself into custody at the designated institution by 2:00 p.m. on February 20, 2018.
2. Mr. Sanders received notice that he had been designated to an institution at Terre Haute, Indiana. Most likely, he will serve his time at the minimum security camp there.

3. Mr. Sanders' fiance is pregnant, in a very high risk pregnancy. She is presently on bedrest. In order to assist her, Mr. Sanders helps her with cooking, cleaning, administering medication, and transportation to medical appointments. Mr. Sanders understands that he cannot be around for this entire process, but he hopes that he can help her through this phase of things.

4. For these reasons, Mr. Sanders would like a 60 day extension in his surrender date, to April 20, 2018.

5. Defense counsel has conferred with AUSA Sarah North concerning this motion. The government has no objection to this motion.

Therefore, it is respectfully requested that this court extend the time by which Mr. Sanders will be required to surrender himself into custody to April 20, 2018, by 2:00 p.m.

Respectfully submitted,

FEDERAL DEFENDER PROGRAM
Carol A. Brook
Executive Director

By: s/ Daniel J. Hesler
Daniel J. Hesler

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CERTIFICATE OF SERVICE

The undersigned, Daniel J. Hesler, an attorney with the Federal Defender Program hereby certifies that in accordance with FED.R.CIV.P5, LR5.5, and the General Order on Electronic Case Filing (ECF), the following document(s):

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was served pursuant to the district court's ECF system as to ECF filings, if any, and were sent by first-class mail/hand delivery on February 2, 2018, to counsel/parties that are non-ECF filers.

By: /s/ Daniel J. Hesler
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